

## UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

April 04, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

ASHLEY TANYA GARCIA

BY: CD

DEPUTY

Case No. SA-23-MJ-00502

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 14, 2020 through December 16, 2020 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. §§ 2261A and 1028  
(a)(7)

Cyberstalking and Identity Theft

Maximum Penalties:

2261A - 5 years imprisonment, \$250,000 fine, 3 years supervised  
release, \$100 mandatory special assessment.1028(a)(7) - 5 years imprisonment, \$250,000 fine, 3 years supervised  
release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.ANTHONY CHESLIC Digitally signed by ANTHONY CHESLIC  
Date: 2023.04.04 14:26:07 -05'00'*Complainant's signature*

Anthony C. Cheslic, FBI Special Agent

*Printed name and title*

- ☐
- Sworn to before me and signed in my presence.
- 
- ☒
- Sworn to telephonically and signed electronically.

Date: April 4, 2023City and state: San Antonio, Texas*Judge's signature*

Richard B. Farrer, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Anthony C. Cheslic, being duly sworn, depose and say that:

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed for approximately two (2) years. I am currently assigned to the San Antonio Division of the FBI on a Cyber Squad, which investigates crimes carried out using computers or computer networks. I have received training in the investigation of cybercrime to include cyberstalking.

2. This affidavit is submitted in support of an Application for a Criminal Complaint for **ASHLEY TANYA GARCIA**. Based upon the information summarized in this application, I have reason to believe and do believe probable cause exists that **GARCIA** has committed Cyberstalking and Identity Theft, in violation of Title 18, United States Code, Sections 2261A(2) and 1028(a)(7), respectively.

3. The facts contained within this affidavit are based upon my investigation and the investigation of fellow FBI agents and other state of Texas law enforcement officers in this matter to date.

**The Investigation**

4. On **December 14, 2020**, The Texas Office of Attorney General--Criminal Investigations Division received a request for assistance from the International Criminal Police Organization (Interpol) related to the cyberstalking and identity theft of C.K., a resident of the United Kingdom. Law enforcement reports from the United Kingdom, Manchester, England, detail the systematic online harassment of C.K. by his former girlfriend, extending, at that time, for over six months. Having determined the cyberstalker, **ASHLEY GARCIA**, had an address in **Pipe Creek, Texas**, with an alternate address in **San Antonio, Texas**, within the Western District of Texas, the criminal investigation was referred to The Texas Office of Attorney General, who subsequently requested the assistance of the Federal Bureau of Investigation.

### **Cyberstalking**

5. On **March 28, 2020**, GARCIA sent emails to the five most senior supervisors at C.K.'s place of employment (Dalmore Capital). The emails contained nude images of C.K. with his penis covered with a small black box along with sexually explicit comments. The emails caused C.K. substantial emotional distress and resulted in C.K. leaving his place of employment. Subsequent communications from **GARCIA** to C.K. emphasized her intent behind the emails – to destroy C.K.'s life.

6. Since leaving his place of professional employment, C.K. has been unable to secure other employment because of **GARCIA's** continued course of conduct which utilizes the internet to injure and harass C.K., causing substantial emotional distress to C.K. Specifically, as is common practice among potential employers, especially for professionals, Google searches are conducted as part of the vetting process. Multiple potential employers informed C.K. that Google searches of his name generate multiple internet domains, i.e., websites bearing his name, which when accessed, link searchers to GARCIA's blog entitled "How to Live in Paris," where she posts injurious and harassing information about C.K. For example, several such entries authored by GARCIA state, "Despite the extreme ego, he is so obsessed with praise he seeks attention by posting photos and videos of his penis on Reddit, and waits with anticipation for comments," and another, "C\*\*\*\*\* K\*\*\*\*\*", Meritocracy, Moral Exceptionalism, Gaslighting, Manipulation, Negging, Oxford, Misogyny, Toxic Masculinity, Misogyny," and yet another, "My ex, C\*\*\*\*\* K\*\*\*\*\*'s dick smelled so badly that I honestly have an irrational fear that I never felt before I met him."

### **Identity Theft**

7. Beginning on or about April 1, 2020, and continuing through the date of this affidavit, **GARCIA** created and maintains domains bearing the victim's name. These domains all link to a single Blogger website "How to Live in Paris" where the victim is again identified by name along with statements intended to, and which do, harass, intimidate, and injure C.K., including but not limited to statements containing sexually explicit details. These domains include various iterations of C.K.'s name and often include references to his professional career, including but not limited to:

- www.c\*\*\*\*\*k\*\*\*\*\*.com
- www.c\*\*\*\*\*jk\*\*\*\*\*.com
- www.c\*\*\*\*\*k\*\*\*\*\*.com
- www.c\*\*\*\*\*k\*\*\*\*\*.co.uk
- www.c\*\*\*\*\*jamesk\*\*\*\*\*.com
- www.c\*\*\*\*\*k\*\*\*\*\*limited.com
- www.k\*\*\*\*\*capital.com
- www.k\*\*\*\*\*consultants.com
- www.k\*\*\*\*\*finance.com
- www.c\*\*\*\*\*k\*\*\*\*\*finance.com
- www.k\*\*\*\*\*privateequity.com
- www.k\*\*\*\*\*magdalenoxford.com
- www.c\*\*\*\*\*k\*\*\*\*\*.org

8. On or about May 1<sup>st</sup>, 2020, **GARCIA** emailed a link to C.K.'s employer that directed them to the content she had authored and published online, again intending to injure, harass, and intimidate. When confronted by C.K., **GARCIA** admitted her actions, as well as her intention with the online course of conduct -- to cause destructive harm to C.K.

#### *1&1 IONOS, Inc. Subpoena Return*

9. On December 16<sup>th</sup>, 2020, 1&1 IONOS, Inc., a company that manages and sells online domain names, responded to a subpoena. 1&1 IONOS, Inc. identified the registration of two online domain addresses and accounts, one with the name c\*\*\*\*\*k\*\*\*\*\*.com the other bearing the name c\*\*\*\*\*k\*\*\*\*\*.org. The order also includes the creation of an email account under the name of **contact@ c\*\*\*\*\*k\*\*\*\*\*.com**. The invoice indicates the domains are owned and operated by **GARCIA** as the purchaser of services and was paid for by a MasterCard issued to **GARCIA** with the last four digits of 8334. The invoice bears the address of the owner/operator who placed the order; it is **GARCIA's San Antonio** based address. **GARCIA** currently resides at this address. Both previously mentioned domains remain active and are maintained to this day.

10. Based on the subpoena response from the internet domain company 1&1 IONOS Inc., identifying **ASHLEY GARCIA** as the purchaser and controller of the domains bearing the name of the victim, as well as the victim's statement, **ASHLEY GARCIA** intentionally created and currently possesses multiple domains unlawfully utilizing the victim's name (means of identification) with the sole intent to injure, harass, and intimidate C.K., thus causing extreme emotional distress and significant financial burden due to the loss of employment.

**GARCIA** has committed the suspected offenses within the Western District of Texas and elsewhere.

### CONCLUSION

11. Based on the facts as stated in this document, your Affiant believes there is probable cause to believe that **GARCIA** has committed the offenses of Cyberstalking and Identity Theft, in violation of Title 18, United States Code, Sections 2261A and 1028(a)(7), respectively.

12. I respectfully request that the Court issue an arrest warrant for **ASHLEY TANYA GARCIA**.

Respectfully submitted,

**ANTHONY  
CHESLIC**

Digitally signed by  
ANTHONY CHESLIC  
Date: 2023.04.04  
14:26:44 -05'00'

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Anthony C. Cheslic  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn telephonically on this 4<sup>th</sup> day of April 2023.



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HONORABLE RICHARD B. FARRER  
UNITED STATES MAGISTRATE JUDGE